From:
 Nicholas Goodman

 To:
 Ahmad Keshavarz

 Subject:
 RE: Francois fees

 Sent:
 12/18/2024 10:11:34 AM

Settlement Communication\ Rule 408

Ahmad,

Defendants' offer to resolve Plaintiff's attorney fee claim is \$50,000.00.

Please advise.

Regards,

Nick

H. Nicholas Goodman

Nicholas Goodman & Associates, PLLC 333 Park Avenue South, Suite 3A New York, N.Y. 10010 Office Main (212) 227-9003 Direct Dial (917) 386-2701 Cell (917) 470-7805 ngoodman@ngoodmanlaw.com

www.ngoodmanlaw.com

This electronic mail and any attachments are STRICTLY CONFIDENTIAL and may be protected by the ATTORNEY-CLIENT PRIVILEGE. This content is solely for the use of the intended recipient herein. If you are not the intended recipient, any use, disclosure, copying, or distribution of this electronic mail is UNAUTHORIZED. If you have received this electronic mail in error, please notify the sender immediately by calling (212) 227-9003, and please immediately delete this email.

Thank you.

From: Ahmad Keshavarz <ahmad@newyorkconsumerattorney.com>

Sent: Tuesday, December 17, 2024 3:02 PM

To: Nicholas Goodman < Ngoodman@ngoodmanlaw.com>

Subject: RE: Francois fees

Nick,

Following up. Did your client have a response or counter offer to our fee demand? Obviously the more time that goes forward the more time we have to bill for a fee petition, so if we are going to resolve this it is in everyone's interest to do so sooner rather than later. Thanks.

From: Nicholas Goodman [mailto:Ngoodman@ngoodmanlaw.com]

Sent: Friday, December 13, 2024 6:26 PM

To: Ahmad Keshavarz Subject: RE: Francois fees

I did convey your demand but have not heard back. I will revisit with them Monday.

H. Nicholas Goodman

Nicholas Goodman & Associates, PLLC 333 Park Avenue South, Suite 3A New York, N.Y. 10010 Office Main (212) 227-9003 Direct Dial (917) 386-2701 Cell (917) 470-7805

ngoodman@ngoodmanlaw.com www.ngoodmanlaw.com

This electronic mail and any attachments are STRICTLY CONFIDENTIAL and may be protected by the ATTORNEY-CLIENT PRIVILEGE. This content is solely for the use of the intended recipient herein. If you are not the intended recipient, any use, disclosure, copying, or distribution of this electronic mail is UNAUTHORIZED. If you have received this electronic mail in error, please notify the sender immediately by calling (212) 227-9003, and please immediately delete this email.

Thank you.

From: Ahmad Keshavarz ahmad@newyorkconsumerattorney.com

Sent: Friday, December 13, 2024 6:24 PM

To: Nicholas Goodman < Ngoodman@ngoodmanlaw.com >

Subject: Francois fees

Did your client have an offer to settle on fees?

Ahmad Keshavarz